

NIRMAN SHARE BROKERS PVT. LTD.

**Anti money laundering policy**

As per SEBI act 1992 And prevention of money laundering act 2002 (PMLA)

Made it mandatory to us with effect from 1<sup>st</sup> July 2005 to report on suspicious transaction and due diligence is to be carried out by us on regular basis.

Our status & policy is as under

- 1 We do not deal in cash whatsoever.
- 2 We keep a close watch on suspicious transactions.
- 3 the process of Due cares is taken while opening any new account the details in KYC is crossed verified from available published data.
4. The proper training is impacted to our entire staff member and made them aware about the policy and risky clients.
5. The clients are not allowed to take positions beyond their risk bearing ability and their known net worth.
6. The trading activities is of all clients is being reviewed by us on daily basis and any unusual position or trading activity is observed then the clarification is sought form the clients.
7. No known person is allowed to open the trading account the net worth, their business activities or their social status in society is generally known to us and introduces by proper person in such cases only the person is permitted to open and operate trading account.
8. Further, all new trading accounts are identified as close observation category and close watch is kept on their trading activity and if any unusual exposure or undesired activity is noticed than such

clients are discounted till proper and convincing explanation is offered by the client.

9. We ensured to provide proper training to identify such clients and such trading activity further they all our staff members are strictly instructed not permit any client any unusual trading activity without bringing to the notice of the director.

10. All rules and regulations is being observed by us.

11. The process of due diligence process is observed very carefully at the time of accepting any person as a client.

12. A close monitoring is carried out and highlights such risky clients who may have taken exposure beyond their known net worth.

13. All KYC updated regularly and audit trail is kept for all transactions of payin of fund and securities such transactions are permitted only if there are routed through their known accounts no.

14. The action taken by any regulatory authorities and persons with criminal background or banned entities by SEBI or RBI or any such authorities is kept a watch and verified before accepting any person as a client.

15. We do not permit any one to operate the client trading account other than the respective client. The proper identification of clients order is carried out in the event of any doubt the phone call is terminated and recalled is made on clients registered contact detail and in case proper verification is carried out in such case only the exposure is taken.

16. The high risk clients are identified based on margin shortfalls payin delay etc. is being viewed seriously and such client are not allowed to take any new position in Futures.

17. The required records and audit trail is also marinated and kept record of .

